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2 Nevada Bar No. 09606

3 **LACH INJURY LAW**

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9 *Attorney for Plaintiff*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 LOUELLA POOL, an individual,

13 Case No.: 2:22-cv-00255-JCM-DJA

14 Plaintiff,

15 v.

16 SMITH'S FOOD AND DRUG CENTERS, INC., a
17 foreign corporation; NICHOLAS SHOOP, an
18 individual; DOE STORE MANAGER I through V;
19 DOE STORE EMPLOYEE I through V; DOE &
20 ROE EMPLOYERS; DOE OWNERS I through V;
21 ROE OWNERS I through V; and ROE
22 COMPANIES I through V, inclusive,

23 Defendants.

24 **STIPULATION TO EXTEND TIME TO
25 FILE OPPOSITION (First Request)**

26 COME NOW, Plaintiff LOUELLA POOL (hereinafter "Plaintiff"), by and through her counsel
27 of record, DARREN J. LACH, ESQ. of LACH INJURY LAW, and Defendants SMITH'S FOOD
28 AND DRUG CENTERS, INC. and NICHOLAS SCHOOP (hereinafter "Defendants"), by and through
their counsel of record, ANDRE T. MARQUES, ESQ. and JERRY S. BUSBY, ESQ. of the law firm
COOPER LEVENSON, P.A., and hereby stipulate that Plaintiff may have an extension to March 7,
2022, to file a response and/or opposition to Defendant NICHOLAS SHOOP'S Motion to Dismiss
Plaintiff's Complaint. Defendant SHOOP'S Motion to Dismiss Plaintiff's Complaint was filed on

1 February 14, 2022, with Plaintiff's Response and/or Opposition currently due on February 28, 2022.
2 Due to the recent holiday and Plaintiff's counsel having a family emergency with a person in the ICU,
3 the parties stipulate to allow Plaintiff to file a response and/or opposition to Defendant's Motion to
4 Dismiss by March 7, 2022.

5
6
7 DATED this 25th day of February, 2022.

8 By: /s/ Darren J. Lach
9 **DARREN J. LACH, ESQ.**
Nevada Bar No. 09606
10 **LACH INJURY LAW**
8870 S. Maryland Pkwy., Suite 135
11 Las Vegas, Nevada 89123
12 *Attorney for Plaintiff*

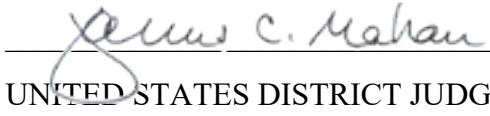
DATED this 25th day of February, 2022.

By: /s/ Andre T. Marques
JERRY S. BUSBY, ESQ.
Nevada Bar No. 01107
ANDRE T. MARQUES, ESQ.
Nevada Bar No. 014737
COOPER LEVISON, P.A.
3016 West Charleston Blvd. - #195
Las Vegas, Nevada 89102
Attorneys for Defendants

14 **ORDER**

15 IT IS SO ORDERED.

16 Dated March 1, 2022.

17
18 
19 James C. Mahan
20 **UNITED STATES DISTRICT JUDGE**

Subject: RE: Pool v. Smith's re SAO to Extend Opp due date
Date: Friday, February 25, 2022 at 2:15:03 PM Pacific Standard Time
From: Marques Andre
To: Darren Lach, Kraemer, Gregory A.
CC: Ganniny, Rutkowski Theresa H.
Attachments: image001.png

You may affix my e-signature.

Thanks,
Andre

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From: Darren Lach [mailto:darren@lachinjurylaw.com]
Sent: Thursday, February 24, 2022 2:41 PM
To: Marques Andre; Kraemer, Gregory A.